IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA, Petitioner,	)	
	)	Case No.: 15-06004-07-DGK
vs.	)	
JOSE LUIS RUIZ-SALAZAR, Respondents.	)	

RESPONSE IN OPPOSITION TO DEFENDANT MORGAN'S MOTION FOR CONTINUANCE OF TRIAL SETTING

Defendant Sabrena Morgan has filed a motion to continue trial of this case from May 31, 2016, to August 22, 2016. Defendant Jose Luis Ruiz-Salazar opposes the motion and asserts the following:

1. On July 29, 2014, the United States filed an Indictment charging Defendant Morgan with one count of conspiracy to distribute methamphetamine in violation of 21 U.S.C. Section 841(a)(1),(b)(1)(A) and 846, one count of money laundering conspiracy in violation of 18 U.S.C. Section 1956(a)(1)(A)(I) and (h), one count of possession of firearms with drug trafficking in violation of 18 U.S.C. Section 924(c)(1)(A)(i), and one count of maintaining a drug premises in violation of 21 U.S.C. Section 856(a) and (b).

2. A superseding indictment was filed on July 7, 2015, adding additional defendants, including Mr. Ruiz-Salazar. Among other serious charges pertaining to various defendants, each defendant is charged in the superseding indictment with at least one count of participating in a Class A drug trafficking conspiracy.

3. Mr. Ruiz-Salazar was arraigned on August 17, 2015, and a scheduling conference

was held on August 25, 2015. Defendant Ruiz-Salazar was placed on the May 31, 2016, trial docket.

4. Defendant Morgan filed a Motion to Continue Trial setting on April 19, 2016, citing "that the Government is still conducting significant investigation into this matter. Additionally, the Government indicated that it has conducted less than fifty percent of the anticipated proffers…An additional period of at least ninety (90) days will greatly assist the above-mentioned items being completed prior to trial."

5. Given that this matter has been pending for nearly a year, and the basis for the requested continuance does not benefit defendants but instead the Government, counsel does not believe that the ends of justice exception under 18 U.S.C. 3161(h)(8) are met in this case.

6. It is respectfully submitted that the ends of justice served by the granting of the requested continuance do not outweigh the best interests of the public and of the defendants in a speedy trial.

Based on the reasons set forth herein, Defendant Jose Ruiz-Salazar objects to the request for continuance.

Respectfully Submitted,

The Gordon Law Firm, LLC

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ATTORNEY FOR DEFENDANT RUIZ-SALAZAR

CERTIFICATE OF SERVICE

I certify that on May 2, 2016, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system, which will send notice of electronic filing to all counsel or record in this case.

/s/ *Tracy L. Spradlin*
Tracy L. Spradlin